

DEPARTMENT OF THE INTERIOR  
**MINERALS MANAGEMENT SERVICE**  
**INTERIM POLICY DOCUMENT**

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99-01

Minerals Management Service  
Telecommuting Program

January 25, 1999

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1. Purpose. To establish policy and basic parameters for an MMS telecommuting program.

2. Authority.

A. July 11, 1994, President Clinton memorandum adopting the National Performance Review recommendation for expanded opportunities for Federal workers to participate in a flexible work arrangement.

B. June 21, 1996, memorandum from President Clinton to Executive Heads of Departments and Agencies, Implementing Federal Family Friendly Work Arrangements.

3. Policy. The MMS Telecommuting Program will provide qualifying employees the opportunity to perform their duties away from their official duty station.

4. Scope. The policy applies to all MMS entities where there is adequate staffing to provide the office interaction necessary to get the job done and support customers, while allowing necessary travel, training, and employee friendly opportunities.

5. Definitions.

A. Short-Term Telecommuting - Telecommuting for short periods of time (generally 6 months maximum) to recuperate from surgery, illness, pregnancy, or care for an immediate family member recovering from the same. Employee typically does not report to the office at all during short-term telecommuting arrangements. Short-term telecommuting requests are usually accompanied by a medical statement either indicating the employee is physically able to work at home, or supporting the employee's need to care for a family member.

B. Long-Term Telecommuting - Telecommuting agreements typically involve an employee working at home, telecommuting center, or other offsite location for 1 or more days per pay period.

6. Responsibilities.

A. Director is responsible for establishing the MMS Telecommuting Program.

B. The Associate Director for Administration and Budget will appoint a Bureau Telecommuting Coordinator.

C. Division Chiefs/or equivalents, and above officials, will have final approval of telecommuting agreements.

D. The Bureau Telecommuting Coordinator is responsible for coordinating program implementation, providing guidance to supervisors on program components, and selection process. The BTC acts as liaison between the Bureau and telecommuting centers and maintains appropriate information for reporting to requesting officials.

E. Local Telecommuting Coordinators will represent each location. The LTC's major responsibilities are:

(1) maintaining records on the local program; i.e., signed agreements, terminated agreements, safety checklists, etc.;

(2) providing coordination between supervisors and telecommuters on issues relating to telecommuting;

(3) providing coordination of ADP resources for telecommuters; and

(4) providing statistical information to the BTC.

F. First-line supervisors will:

(1) Evaluate those jobs under their supervision that have telecommuting potential. Once that is established, explore the following for each individual request:

Knowledge Requirements:

- Does the employee have the knowledge needed to work at home? To what extent does the employee need close supervision or input from others that is only available at the office?

Contact Requirements:

- What percentage of the job is devoted to "face to face" contact with other employees or agencies, the public or internal agency staff?
- Can contact be readjusted to allow for telephone communications or can such contact be conducted when the employee is at the conventional office?

Reference Materials Requirements:

- What percentage of the job requires resources located in the main office? Can these resources be easily removed and taken home for a day or two?

Are these resources available through other means such as a computer-accessible library service?

Special Equipment Requirements:

- What percentage of the job relies upon access to computers, photocopiers, fax machines, or other specialized equipment? Can access needs be grouped and scheduled for days when the employee is in the conventional office?

Travel Requirements:

- Does the job involve field work? Can trips begin or end at the home office rather than the main office?

Information Security Requirements:

- Can tasks which can be completed at home (i.e., which do not violate security procedures) be grouped and scheduled for telecommuting days?

(2) Evaluate telecommuting requests, ensuring that:

- (a) the Program Requirements (7., below) are considered and met;
- (b) no adverse effect will result on the office accomplishing its work;
- (c) other office staff are given equal consideration;
- (d) the cost analysis accurately represents the cost effectiveness of the

proposal.

(3) Enter into the agreement with the employee, modified if appropriate, and forward to the approving official.

(4) Terminate the arrangement where the overall interest of the office is adversely affected or the telecommuter is not meeting the terms of the agreement. The LTC will be notified upon termination of any agreement.

G. Employees will:

- (1) present a written proposal requesting participation in the Program;
- (2) work with their first-line supervisor to reach appropriate modifications, if necessary;
- (3) adhere to the Program policy and the signed Telecommuting Agreement;

- (4) terminate the arrangement, if necessary, for any reason.

## 7. Program Requirements.

A. Long-term telecommuting agreements require a cost analysis showing that an employee's participation will be cost-neutral or result in a savings to MMS. (An exception to this requirement is where an employee is suffering a long-term or chronic illness and can continue to perform his/her responsibilities only by telecommuting.) The cost analysis will include as a minimum the following factors:

(1) Information Technology Costs - this includes both hardware and software as well as peripheral equipment such as printers, faxes, etc.;

(2) Office Space - long-term arrangements should factor in a program/office space reduction of 3 permanent workstations for every 5 telecommuters; and

(3) Telephone Lines - the cost of installing additional phone lines in an employee's home as well as monthly usage costs.

Costs can be borne by the Division or the employee depending on how a savings or cost neutrality will be achieved.

B. The location will be a setting other than the employee's assigned office; i.e., a telecommuting center, another office, or the employee's home. The site will be mutually agreeable to the employee and supervisor.

C. Work is to be performed during established work hours; no work is to be performed between 6 p.m. and 6 a.m. or on weekends or holidays unless prior overtime authorization is received or an alternative work schedule is established with the supervisor.

D. Supervisor and employee enter into an agreement which will identify at a minimum:

(1) work site;

(2) number of days telecommuting;

(3) how office calls/customers will be handled;

(4) amount of contact with office/supervisor; and

(5) cost analysis illustrating the cost associated with the telecommuting contract.

E. Equipment used for telecommuting can be furnished by either the Bureau or the participating employee provided it is compatible with the existing LAN, support systems, hardware, and software. (The LTC can coordinate determination of employee equipment compatibility with local ADP resources.) Equipment includes:

(1) computer (hardware and software);

(2) printer/fax; and

(3) telephone (phone lines can be installed and monthly bills paid by the Government and/or employees can use Government calling cards, but long-term agreements must be cost-neutral or provide a cost savings to be approved).

8. Procedure. Participation in the Telecommuting Program will be accomplished through the following:

A. Employee will present a written proposal to first-line supervisor requesting approval to telecommute. Proposal should include:

(1) number of hours and days per week employee would telecommute;

(2) job functions employee would perform while telecommuting;

(3) where the work will be accomplished;

(4) a cost analysis including equipment the employee would be using and what equipment employee would need MMS to furnish, indicating both hardware and software. Phone line installation costs and monthly usage costs should also be included in the analysis as should who will be incurring those cost, MMS or the employee.

(5) Logistics. How phone calls and other daily dealings with customers will be handled.

B. First-line supervisor will review the proposal and consult with the employee. The supervisor can accept, decline, or propose an alternative arrangement. Long-term telecommuting proposals must be cost-neutral or provide a savings to MMS in order to be accepted.

C. Once either the employee's request or the supervisor's alternative has been accepted by both parties, the supervisor and employee should review the MMS Telecommuting Policy. The MMS Telecommuting Agreement and Safety Checklist are then reviewed. The employee and the first-line supervisor sign the Agreement and the Checklist. The second-line supervisor signs the Agreement as the approving official.

D. The supervisor reviews with the employee the logistical requirements; what equipment, supplies, and space will be provided by whom. The telecommuting employee will be responsible for transporting the equipment to the remote location.

E. If a General Services Administration telecommuting center is to be used as an alternative worksite, a cost agreement between MMS and GSA will be signed by the appropriate parties. This will require coordination with the BTC or LTC. In long-term arrangements, the cost of the center must be factored into the cost analysis.

F. Schedule installation of equipment at the remote site. If the employee cannot install the equipment, the supervisor will ask the LTC to coordinate with the Program work group responsible. These costs should be factored into the cost analysis for long-term agreements.

G. Supervisor will inform other employees in the work unit of the telecommuting employee's schedule and of any circumstances affecting them.

H. Closely monitor the first few weeks to ensure that any problems are resolved timely and conduct periodic equipment reviews of telecommuting employees while in the program.

9. Exceptions. The cost analysis provision of this policy can be waived by offices in California in order to comply with existing Air Quality Regulations.

10. Cancellation. This IPD is canceled 1 year from the date of issuance.

/s/

Cynthia Quarterman  
Director

Attachment

## Questions and Answers On Telecommuting

### I. General Criteria and Benefits

Q. *What is telecommuting?*

A. Telecommuting, flexible workplace, teleworking, and work at home all refer to paid employment away from the traditional office. Telecommuting means working 1 or more days at home or in an office very near home, rather than in the traditional office, often using a computer and a modem to transmit data or information over telephone lines. Telecommuting arrangements may include the following:

Home-based working in the employee's residence in a space specifically set aside as a work area.

Telecenter facility working from an office near the employee's home. The building is owned or leased by one or more agencies. Telecenter employees work at that location primarily because it is close to their home, not necessarily because they belong to the same work unit.

Q. *What types of jobs are adaptable to a telecommuting program?*

A. Positions that have an information component or where there is no need for an office work station at a particular location. Examples of occupations which are site independent include:

- Easily quantifiable tasks; e.g., data processing, word processing.
- Project-oriented tasks; e.g., those that primarily require one to think and write.
- Reading/processing tasks; e.g., reading proposals and reviews, making funding decisions, conducting research.

Q. *What if an employee needs to work at an alternate worksite only once in awhile, or for a brief period. Does the telecommuting program still apply?*

A. Yes. Although different situations may be handled differently, all alternate worksite arrangements are covered by the program, even the 1 day you spend at home to finish that overdue report.

1. Periodic or intermittent - infrequent periods of time when projects or assignments have short turn around times and/or require intense concentration. Under such circumstances, the employee typically works for a day or so at home.

2. Short-term - occasional or infrequent periods of time (generally 6 maximum) to recuperate from surgery, illness, pregnancy, or care for an immediate family member

recovering from the same. Employee typically does not report to the office at all during short-term telecommuting arrangements. Short-term telecommuting requests are usually accompanied by a medical statement either indicating the employee is physically able to work at home, or supporting the employee's need to care for a family member.

3. Long-term - regularly scheduled or designed to last over 6 months.

We also have telecommuting arrangements at established satellite work centers. Employees generally work at such centers 1 or 2 days per week. Reasons may include any of the above.

Q. *How many days should an employee work offsite?*

A. When using a short-term arrangement to, for example, recuperate from surgery, employees generally do not report to the office at all, but the arrangement is only for a short duration of time (generally 2-3 months).

In longer term arrangements, however, there is generally a need for the employee to report to the traditional office each week. When using long-term arrangements, the actual number of days the employee works between the traditional and the home office is determined by the employee and the immediate supervisor. Participation at telecenter work stations is based on availability of space and user costs. Due to space limitations, operating administrations may restrict the number of days an employee may use a center.

## II. Participation in the Program

Q. *Does an employee have a right to participate in the program?*

A. No. Participation in the telecommuting program is not a right. Management is responsible for deciding if the position is one that is appropriate for offsite work and for examining both the content of the work and the performance of the employee. Because this is a management work option, there is no automatic right of the employee to continue participation in the event of a change of supervisors, a change in duties, or a reevaluation of employee performance.

Q. *Can a supervisor require an employee to work at home?*

A. No. Participation in the flexible workplace program is entirely voluntary on the part of the employee. Employees may not be "forced" to participate.

Q. *Who is responsible for approving a flexiplace request?*

A. The actual decision for an employee to participate is left to the individual employee, immediate supervisor, and/or approving official. In MMS, approval to participate is obtained within your own management chain.



### III. Management Responsibilities

Q. *As a manager/supervisor, what do I need to consider before agreeing to a work-at-home arrangement?*

- A. Before a manager/supervisor can consider a telecommuting request seriously, he/she and the employee must first ensure that there is no negative impact on the office's workload, then examine the job requirements. While some jobs might be performed almost 100 percent offsite, most jobs require a certain amount of time at the main office, and some jobs are not suitable at all for alternative workplace arrangements.

Obviously, jobs that require the worker to perform a hands-on service for others such as mailroom service, supplies delivery, reproduction/printing, meetings with the public, etc., are not adaptable to a telecommuting arrangement. Neither are positions requiring close supervision.

After deciding that a job has telecommuting possibilities, other criteria, such as the following, must be explored:

#### Knowledge Requirements:

- Does the employee have the knowledge needed to work at home? To what extent does the employee need close supervision or input from others that is only available at the office?

#### Contact Requirements:

- What percentage of the job is devoted to "face to face" contact with other employees or agencies, the public, or internal agency staff?
- Can contact be readjusted to allow for telephone communications or can such contact be conducted when the employee is at the conventional office?

#### Reference Materials Requirements:

- What percentage of the job requires resources located in the main office? Can these resources easily be removed and taken home for a day or two? Are these resources available through other means such as a computer-accessible library service?

#### Special Equipment Requirements:

- What percentage of the job relies upon access to computers, photocopiers, fax machines, or other specialized equipment? Can access needs be grouped and scheduled for days when the employee is in the conventional office?

Travel Requirements:

- Does the job involve field work? Can trips begin or end at the home office rather than the main office?

Information Security Requirements:

- Can tasks which can be completed at home (i.e., which do not violate security procedures) be grouped and scheduled for telecommuting days?

Q. *How do I screen potential employees for consideration for the program?*

A. Criteria for selecting occupations and employees are guides rather than hard and fast rules. Some criteria focus on suitability of work, others focus on suitability of employees.

Selection criteria.

The following criteria should be considered by supervisors in deciding whether to approve an employee's request:

- Nature of work to be performed and suitability for offsite performance.
- Ability to measure and monitor work assignments against established quantity and quality norms.
- Evidence of the employee's ability to work independently.
- Equipment needs and costs (employees can furnish equipment but long-term agreements must at least be cost neutral to the MMS).
- Impact on other staff.
- Benefits to be derived.

Employees who would be considered successful candidates for flexiplace generally have a number of work-related characteristics in common, including such qualities as:

- History of reliable and responsible behavior. Trust of his/her supervisor.
- Ability to establish priorities and manage his/her own time. A full understanding of the work operation.

Q. *Should a specific schedule be set for the offsite work?*

A. Yes. All work schedules are discretionary and require management approval. Any otherwise appropriate work schedule (e.g., flextime, 5/4/9, etc.) may be approved for a flexiplace employee. The work schedule must be consistent with requirements of the employee's workgroup and provisions of the employee's collective bargaining agreement, if applicable. A fixed and preset schedule of offsite hours must be established by the supervisor and understood by the employee. During offsite hours, the employee must perform work at a predetermined agency-approved site (e.g., home, satellite facility). Absences from the offsite worksite,;e.g., visits on official business to attend meetings or to take annual or sick leave,

must be coordinated with the supervisor. The supervisor may ask flexiplace employees to certify their time and attendance for offsite hours to avoid future questions.

Q. *How can I monitor work performance when the employee is not physically present?*

A. Output of quantifiable tasks can be measured the same way as it is now being done in the office. Nonquantifiable or project-oriented tasks are measured less directly, but should not change that significantly from current onsite measurement. Normally, this would involve:

- Establishing the nature and objective of the task.
- Setting deadlines or due dates.
- Setting status report/meeting periods (e.g., weekly).

Comparing the employee's output with other onsite work history and with similar tasks being performed by onsite workers should also enable the supervisor to judge the productivity of a participant in the flexible workplace program.

Q. *What about the impact on the office when some employees are working offsite?*

A. Before an employee begins to work offsite, certain guidelines must be established to minimize adverse impact on other staff members. The overall interests of the office must take precedence over working offsite. A supervisor may require an employee to be onsite on a regular offsite day if the needs of the office require it. In addition, one person's offsite work should not adversely affect performance of other employees. Flexiplace should not put a burden on staff remaining in the office. Not only should an equitable distribution of workload be maintained, but methods should be instituted to ensure that office employees do not have to handle the work of an employee located at a remote worksite.

Q. *What if a manager believes the arrangement with an employee is not working out?*

A. Management has the right to end participation of an employee in the program. Flexible workplace arrangements are not a right or condition of employment. Management may end an employee's participation in the program when the employee's performance declines and/or organizational needs necessitate that the employee report to the traditional office. Whenever feasible, the agency should provide reasonable notice prior to the cancellation of the arrangement.

The employee may also request an end to his or her flexiplace participation, without giving reason, at any time. In this situation, management will make arrangements for the employee to resume working at the main office as quickly as possible. Any time an employee ceases to telecommute, no matter what the reason, the local telecommuting coordinator must be notified.

#### IV. Cost Considerations

- Q. What are the cost factors for setting up a flexiplace arrangement in the home?
- A. For some situations, the up-front costs may be minimal or nonexistent. More commonly, the employee will need access to a variety of equipment and/or will use the telephone extensively on flexiplace days. The following types of up-front and ongoing expenses are associated with telecommuting and should be included in all cost determinations:
1. Long distance charges.
  2. Telephone usage charges (other than long distance).
  3. Computer, typewriter, fax machine, etc., assigned to the employee's home.
  4. Computer software.
  5. Modem and possible computer usage charges.
  6. Modifications to the central computer to allow employees to dial in.
  7. Equipment maintenance and repair charges (Government-owned).
  8. Remote technical assistance.
  9. Replacement of damaged or lost Government-owned equipment.
  10. User fee for telecommuting center space.

In addition, employees may incur expenses for office-type furniture, answering machines, and other amenities to make home work areas more productive.

- Q. *Will the employee be reimbursed for utility and other expenses associated with offsite work?*
- A. No. The Government assumes no responsibility for participating employee's expenses related to heating, electricity, and space usage. The rationale is the benefits of working at home offset incidental increases in utility expenses.
- Q. *What are the rules on an additional telephone line?*
- A. Section 1348 of Title 31, U.S. Code prohibits the use of appropriated funds to pay for telephone installation and service in private residences,;however, Public Law 101-509 provides that, during the fiscal year ending on September 30,1991, agencies participating in the Federal Flexiplace Project may use appropriated funds to install telephone lines, necessary equipment, and pay monthly charges in employee residences, provided the agency certifies that safeguards to prevent abuse are in place and the service is necessary to support the agency's mission. This legislation was made permanent in FY1996. (See H.R. 2020, Sec. 620.)
- Q. *What are the cost factors for a telecenter arrangement?*
- A. You will need to check the specific dollar amount with your Local Telecommuting Coordinator. At the present time, the Telecenter Pilot Project is being subsidized, making the actual costs or user fees very nominal.

## V. Safety Liability and Workmen's Compensation

Q. *How do I ensure that the alternate work-at-home arrangement is safe?*

- A. Each participating employee signs a self certification safety checklist. Employees are responsible for ensuring that their homes comply with health and safety requirements. Home offices must be clean and free of obstructions. The home must be in compliance with all building codes and free of hazardous materials. Management may deny an employee the opportunity to participate or may rescind a telecommuting agreement based on safety problems in the home or suspected hazardous materials in the home. Management may also have the home office inspected for compliance with safety requirements when deemed appropriate. Inspections will be made by appointment only.

If an employee is injured while at home, worker's compensation law and rules apply. Employees must notify their supervisor immediately and complete all necessary documents regarding the injury.

Supervisors must investigate all reports immediately following notification.

Q. *What about liability for injuries at home? How can a supervisor certify an employee's claim?*

- A. The supervisor's signature on a request for compensation attests only to what the supervisor can reasonably know, whether the event occurred at a conventional worksite or at an alternate worksite (e.g., home). Under normal circumstances, supervisors are often not present when an employee sustains an injury. Employees in all situations bear responsibility for informing their immediate supervisor of an injury at the earliest time possible. They must also provide details to the Department of Labor when filing a claim.

## VI. Child Care and Taxes

Q. *Will the telecommuting program reduce child care costs?*

- A. No. Work at home and child care are generally not compatible. Young children create too many distractions for the parent working at home. Telecommuting is not intended to serve as a substitute for child care. However, it may reduce child care costs by reducing the number of hours of care necessary due to time saved commuting. In some cases, it could eliminate the need for before and after school day care.

The opportunity to participate in a telecommuting program is offered only with the understanding that it is the responsibility of the employee to ensure that a proper work environment is maintained (e.g., dependent care arrangements are made so as to not interfere with the work, personal disruptions such as nonbusiness telephone calls and visitors are kept to a minimum, etc.). The employee and his/her family should understand that the home office is just that, a space set aside for the employee to work. Family responsibilities must not interfere with work time at home.

Q. *Does an employee who uses a portion of his/her home qualify for any Federal tax deductions?*

A. No. The Internal Revenue Service has issued strict rules on tax deductions for home offices and equipment. Employees should consult their tax advisor before reaching any conclusion on the tax status of their home office.

## VII. Computer Equipment

Q. *What equipment will the employee need when working from home?*

A. Some employees may do their work at home with paper and pen. Other employees may require a computer, modem, or other equipment to do their jobs. An important consideration is compatibility of equipment used at home with that of central office equipment. Compatible equipment facilitates a more efficient home arrangement.

Q. *Will the agency provide computers and other equipment for employees' use offsite?*

A. Organizations may make this decision on a case-by-case basis, considering such factors as the nature of the work, availability of existing equipment, cost neutrality, etc. In some instances, participation in the program may be contingent on the availability of equipment.

The Government may place computers and other ADP and telecommunications equipment in the home while retaining ownership and control. In these situations, the Government is responsible for maintenance, repair, and replacement of such equipment. It is important that employees understand that any Government-owned equipment used at home, may only be used for official purposes. Employees who telecommute must adhere to all rules, regulations, and procedures relating to security and confidentiality.

Q. *Who is responsible for transporting equipment to and from offsite locations?*

A. Transfer of computers, printers, modems, and other equipment to and from the office to the home residence is the employee's responsibility.

Q. *How do I arrange for equipment repair?*

A. Maintenance, repair, and replacement of Government-owned equipment issued to employees is the responsibility of the agency or operating administration. The employee must notify his/her supervisor immediately following a malfunction of agency-owned equipment. The employee may be asked to return the equipment to the office for repairs. If repairs are extensive, the employee may be asked to report to the main office until equipment is usable.

## VIII. Pitfalls to Avoid

Many of the common pitfalls and traps that telecommuting employees and their supervisors may encounter have already been identified. Fortunately, ways to avoid these situations have also been developed. Much of the training for employees and their supervisors addresses how to get started correctly and how to deal with problem situations as they arise. The following are examples of some of the common pitfalls and traps to avoid:

- Co-workers do not know when the employee will be in the office. There is a general sense that the employee is never around.

Alternative: Post a schedule when each employee is in the office and when they are out (either at home, at the conventional office, or on approved leave).

- Managers and employees do not have a clear understanding of work expectations.

Alternative: Define work expectations in advance to avoid misunderstanding.

- Co-workers are not able to contact the employee (and are sometimes actively discouraged). Clerical staff are unclear on how or when to contact the employee. There is a general reluctance to call employees at home on their flexiplace days.

Alternative: Provide staff with flexiplace phone number. Encourage staff to call employee on telecommuting days. Supervisors should set an example by calling employees on their home work days and insisting that others continue to transact business with employees working at home.

- Flexiplace is joked about as “goofing off.” Flexiplace days are referred to by co-workers as “days off.”

Alternative: Explain or distribute benefits of flexiplace to staff members. Publicize the products that the flexiplace employee produces while at home.

- Home/work boundaries are blurred.

Alternative: Keep your office separate from your living area, placing it in a separate area. Keep a definite work time and personal time and stick to it.